

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND

UNITED STATES OF AMERICA :

VS. CR No. 1:24-cr-00012-WES-PAS

KYLE REYNOLDS :

MOTION TO MODIFY CONDITIONS:
REMOVE GPS MONITORING AND CURFEW

Now comes Kyle Reynolds and moves this Honorable Court to modify conditions of release in this matter, by removing the conditions of a curfew and GPS monitoring.

Mr. Reynolds was released from custody in this case on January 24, 2024, after his initial appearance. Conditions of release included GPS monitoring with a curfew of 9:00pm to 6:00am. (ECF No. 7). The Court indicated that it would consider a motion to remove this restriction after 90 days if Mr. Reynolds complied fully with all pre-trial release conditions.

The defendant was subsequently indicted. He was arraigned on February 27, 2024, and remained released on the existing conditions. On April 9, 2024, Mr. Reynolds was arraigned on a superseding indictment and remained released on the existing conditions.

Tomorrow, April 23, 2024, will be the 90th day of pre-trial release in this case. Mr. Reynolds has abided by each, and every bail condition set by this Court.

If this motion is allowed, all other conditions of release will remain in full force and effect.

AUSA Paul Daly has been notified of this request.

For the foregoing reasons, Mr. Reynolds respectfully requests that the

conditions of curfew and GPS monitoring be removed.

Respectfully submitted,

Kyle Reynolds

By his attorney,
/s/ Joanne M. Daley, BBO #653375
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CERTIFICATION

I hereby certify that a copy of this motion was delivered by electronic notification to Assistant United States Attorney Paul Daly on April 22, 2024.

/s/ Joanne M. Daley